



# ASSOCIATION OF COMMUNICATION ENGINEERS

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**Member Firms**

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***Ex Parte***

Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

***Re: Connect America Fund: Performance Measures for  
Connect America High-Cost Universal Service***

***Support Recipients***

**Docket No. 10-90; DA 17-1085**

Dear Ms. Dortch:

Representing licensed Professional Engineers working in the telecommunications sector throughout the country, The Association of Communications Engineers (ACE) has monitored this proceeding and takes this opportunity to concur with the Ex Parte comments filed June 18, 2018 by NTCA – The Rural Broadband Association.

The NTCA letter and included attachment correctly discuss the physical and technical limitations of a 1 Gbps circuit supplied via Fiber-To-The-Premises. Specifically, we concur that the tested throughput for these circuits (provisioned circuit size less overheads) will be dependent on the frame size being transmitted with the test result being a best-case scenario of 960Mbps of throughput. The use of smaller frames would result in lower tested throughput as depicted in Figure 2-1 of the referenced NTCA filing. We further concur that technology currently in use does not allow the traditional over-provisioning solution to solve this issue.

Thank-you for the opportunity to provide these comments. A copy of this letter is being filed with ECFS pursuant to FCC rules.

Sincerely,

The Association of Communication Engineers

/s/ Mark D. Massman

Mark D. Massman, P.E.  
President